

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THE GENERAL CONVENTION OF THE
NEW JERUSALEM IN THE UNITED
STATES OF AMERICA, INC., THE
MASSACHUSETTS ASSOCIATION
OF THE NEW JERUSALEM
(SWEDENBORGIAN) and GEORGE
CHAPIN,

Plaintiffs,

v.

EDWARD MACKENZIE, THOMAS
KENNEDY, BOSTON SOCIETY OF
THE NEW JERUSALEM,
INCORPORATED (SWEDENBORGIAN)
and BOSTONVIEW CORPORATION,

Defendants.

CIVIL ACTION
NO. 04-10419-WGY

DEFENDANT EDWARD MACKENZIE'S
FIRST SUPPLEMENTAL ANSWER TO COMPLAINT

Defendant Edward MacKenzie ("MacKenzie"), by his attorneys, supplements his answer to the allegations contained in paragraphs fifty-four through fifty-eight of the Complaint as follows:

54. Mr. MacKenzie states that the term "enforcer" is vague and ambiguous, and therefore lacks sufficient information or knowledge to form a belief as to the truth of this allegation of paragraph 54 of the Complaint. Further answering, Mr. MacKenzie states that for a period of time in the 1980s, he worked for Whitey Bulger, details of which he describes in his published book, "Street Soldier." Mr. MacKenzie admits that

in his past, he was convicted of crimes which are a matter of public record. Mr. MacKenzie denies the remaining allegations contained in paragraph 54.

55. Mr. MacKenzie admits that in connection with his work with Mr. Bulger, he at times used physical force. Mr. MacKenzie admits that he is a former Golden Gloves boxer, broke individuals' arms and legs more than fifteen years ago, bit off an individual's finger, which was an isolated incident, in self-defense more than thirty years ago, and defecated in persons' beds more than thirty years ago. Mr. MacKenzie's admits that as part of his past, he sold drugs. Mr. MacKenzie denies the remaining allegations contained in paragraph 55.

56. Mr. MacKenzie admits that in or about 1990, he was convicted of cocaine trafficking, and placed on probation. This conviction is a matter of public record and no further answer is required. Mr. MacKenzie denies the remaining allegations contained in paragraph 56.

57. Denied.

58. Mr. MacKenzie states that he pled guilty to worker's compensation fraud and has made full restitution. He further states that this conviction is a matter of public record, and no further answer is required. With respect to the article attached as Exhibit E to the Complaint, it speaks for itself and no further answer is required. Mr. MacKenzie denies the remaining allegations contained in paragraph 58.

Respectfully submitted,

EDWARD MACKENZIE,
By his attorneys,

/s/ Nicholas B. Carter

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